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Attorneys for Defendant
 NATIONAL COLLEGIATE ATHLETIC
 ASSOCIATION

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

GRANT HOUSE, et al.,
 Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
 ASSOCIATION, et al.,
 Defendants.

TYMIR OLIVER, on behalf of himself
 and all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
 ASSOCIATION, et al.,
 Defendants.

Case No. 4:20-cv-03919-CW
 Case No. 4:20-cv-04527-CW

CLASS ACTION

**DECLARATION OF RAKESH N. KILARU
 IN SUPPORT OF STIPULATION FOR OR-
 DER EXTENDING CASE DEADLINES**

Hon. Claudia Wilken

1 I, Rakesh N. Kilaru, declare as follows:

2 1. I submit this declaration in support of the parties' Stipulation for Order Extending Case
3 Deadlines.

4 2. I am an attorney at Wilkinson Stekloff LLP and am licensed to practice law in the Dis-
5 trict of Columbia. I represent the National Collegiate Athletic Association in this litiga-
6 tion. The facts set forth herein are of my own personal knowledge and, if called to tes-
7 tify under oath, I could and would testify competently thereto.

8 3. Under the Joint Stipulated Case Management Order, the current deadline for substantial
9 completion of production of documents is June 1, 2021. While the parties have made
10 great progress in meeting and conferring on document-discovery related disputes, a few
11 issues remain to be negotiated. The volume of documents to be reviewed, moreover,
12 will be significant, and a June 1, 2021 deadline does not allow sufficient time to review
13 and produce documents. The parties agree that an additional three months is necessary
14 to conclude the meet and confer process and review documents.

15 4. Subsequent case deadlines set out in the Joint Stipulated Case Management Order are
16 tied to the deadline for substantial completion of production of documents. For exam-
17 ple, Plaintiffs have represented that the current deadline for their class certification mo-
18 tion of November 22, 2021 should be pushed back because it is too close in time to the
19 August 31, 2021 requested deadline for substantial completion of production of docu-
20 ments. Accordingly, extending the deadline for substantial completion of production of
21 documents necessitates the extension of subsequent case deadlines.

22 5. The parties also request modification to other case deadlines that are tied to resolution
23 of the pending motion to dismiss, including the deadlines for Plaintiffs to add additional
24 parties or claims or amend their complaint (including the filing of any consolidated
25 complaint) or for Defendants to file an answer. *See* Joint Stipulated Case Management
26 Order, *House* ECF No. 127 at n.1; *Oliver* ECF No. 94 at n.1. Because the motion has
27 not been resolved, these events have not yet transpired.

28

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Rakesh N. Kilaru
Rakesh N. Kilaru